

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re AMERICAN INTERNATIONAL GROUP,
INC. 2008 SECURITIES LITIGATION

Master File No. 08-CV-4772 (LTS)

**DEFENDANT MARTIN J. SULLIVAN’S JOINDER IN OPPOSITION TO
LEAD PLAINTIFF’S MOTION FOR CLASS CERTIFICATION**

Defendant Martin J. Sullivan (“Mr. Sullivan”) hereby joins and incorporates by reference herein: (i) Defendant AIG’s Memorandum of Law in Opposition to Lead Plaintiff’s Motion for Class Certification; (ii) Defendant PricewaterhouseCoopers LLP’s Memorandum of Law in Opposition to Lead Plaintiff’s Motion for Class Certification; (iii) the Memorandum of Law in Support of the Underwriter Defendants’ Opposition to Lead Plaintiff’s Motion for Class Certification; and (iv) any supporting materials filed therewith (collectively, the “Opposition Briefs”). Mr. Sullivan incorporates by reference, as if fully set forth herein, each and every argument presented in the Opposition Briefs, which have been filed and served contemporaneously herewith.

WHEREFORE, for the reasons set forth in the Opposition Briefs, Mr. Sullivan respectfully requests that this Court deny Plaintiff’s motion for class certification.

DATED: New York, New York
August 17, 2011

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By: /s/ Jamison A. Diehl
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CERTIFICATE OF SERVICE

I, Jamison A. Diehl, an attorney duly admitted to practice before the United States District Court for the Southern District of New York, certify that on August 17, 2011, a true and correct copy of Defendant Martin J. Sullivan's Joinder in Opposition to Lead Plaintiff's Motion for Class Certification was filed electronically. Notice of this filing will be sent by e-mail to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Jamison A. Diehl

Jamison A. Diehl

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